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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN TOUCH CONCEPTS, INC., d/b/a ZCOM,

Plaintiff,

-against-

(1) CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS, (2) TOM
VERGHESE, (3) RYAN BROOMES,
(4) JORGE VELEZ, (5) ANTHONY
FIOCCO, (6) BRUNO PAVLICEK, (7)
AJAY BHUMITRA; (8) SHELLY
BHUMITRA, (9) POONAM SAWNHEY;
and, (10) JOHN/JANE DOE CELLCO
PARTNERSHIP d/b/a VERIZON
WIRELESS PERSONNEL ## 1-10, so named
as their identities have yet to be established,

Defendants

**DOCKET NO.
12-CV-00542 (PGS) (TJB)**

**F.R.C.P. 7.1 DISCLOSURE
STATEMENT BY DEFENDANT
IN TOUCH CONCEPTS, INC.**

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for defendant In Touch Concepts, Inc., d/b/a Zcom Wireless, a private non-governmental corporate party, certifies that In Touch Concepts, Inc. is a New York Domestic Business Corporation with no corporate parents or subsidiaries.

At commencement of this action In Touch Concepts, Inc. had twenty-seven (27) corporate affiliates:

a. 17 of these corporate affiliates were New York Domestic Business Corporations: Wireless Media, Inc., Now Wireless, Inc., Wireless Media of Hewlett, Inc., Zcom Cell Wireless, Inc., Zcom of Carle Place, Inc., Zcom of East Northport, Inc., Zcom of Garden City, Inc., Zcom of Holbrook, Inc., Zcom of Jericho, Inc., Zcom of Lynbrook, Inc., Zcom of Malta, Inc., Zcom of Massapequa, Inc., Zcom of NHP, Inc., Zcom of Plainview, Inc., Zcom of Syracuse, Inc. Zcom of Woodbury, Inc. and Zcomm Wireless, Inc.;

b. 7 of these corporate affiliates were Pennsylvania Business Corporations: Wayne Wireless, Inc., Z Wireless Group, Inc., Zcom of Gateway, Inc., Zcom of Gettysburg, Inc., Zcom Wireless of Newton Square, Inc., Zoom Wireless of Lansdale, Inc. and Zoom Wireless of Paoli, Inc.;

c. 2 of these corporate affiliates were Texas Corporations: Wireless Products, Inc. and Wireless Products of Dallas, Inc.; and,

d. 1 of these corporate affiliates was a Virginia Corporation: Zcom of Virginia, Inc.

All of In Touch Concepts, Inc.'s corporate affiliates also had no corporate parents or subsidiaries.

All shares of stock in In Touch Concepts, Inc., and of each of its affiliates, were, at all times, privately held.

No publicly held corporation owns 10% or more of the stock of In Touch Concepts, Inc. or any of its corporate affiliates.

Dated: New York, New York
May 7, 2012

Respectfully submitted,
THE LAW FIRM OF RAVI BATRA P.C.
Attorneys for Defendant In Touch Concepts, Inc.
d/b/a Zcom

/s/ Michael W. Kennedy
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**CIVIL ACTION NUMBER:
11 Civ. 6493 (PGS) (TJB)**

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN TOUCH CONCEPTS, INC., d/b/a ZCOM,

Plaintiff,

-against-

(1) CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS,
(2) TOM VERGHESE, (3) RYAN BROOMES,
(4) JORGE VELEZ, (5) ANTHONY FIOCCO, (6) BRUNO
PAVLICEK, (7) AJAY BHUMITRA; (8) SHELLY BHUMITRA, (9)
POONAM SAWNHEY; and, (10) JOHN/JANE DOE CELLCO
PARTNERSHIP d/b/a VERIZON WIRELESS PERSONNEL ## 1-10,
so named as their identities have yet to be established,

Defendants

**F.R.C.P. 7.1 DISCLOSURE STATEMENT BY
PLAINTIFF IN TOUCH CONCEPTS, INC.**

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